

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION

STEPHEN McCOLLUM, STEPHANIE §
KINGREY, and SANDRA McCOLLUM, §
individually and as heirs at law to the Estate of §
LARRY GENE McCOLLUM, §
PLAINTIFFS §
§
v. § CIVIL ACTION NO.
§ 3:12-cv-02037
§
BRAD LIVINGSTON, JEFF PRINGLE, §
RICHARD CLARK, KAREN TATE, §
SANDREA SANDERS, ROBERT EASON, the §
UNIVERSITY OF TEXAS MEDICAL §
BRANCH and the TEXAS DEPARTMENT OF §
CRIMINAL JUSTICE. §
DEFENDANTS §

**PLAINTIFFS' UNOPPOSED MOTION TO EXTEND DEADLINE TO DESIGNATE
EXPERTS**

Plaintiffs respectfully ask the Court to extend the deadline to respond to designate expert witnesses.

Plaintiffs' current deadline to designate expert witnesses is October 5, 2013. Defendants' deadline is November 15, 2013.

The parties recently agreed to take the depositions of Rick Thaler (former director of the Texas Department of Criminal Justice's Institutional Division) and William Stephens (current director of the Institutional Division). Plaintiffs' experts will need to review these transcripts before writing expert reports. Unfortunately, the parties were not able to find a mutually agreeable date to take the depositions until October 18, 2013.

Thus, Plaintiffs' ask the Court to extend the expert designation and report deadlines by 30 days from October 18, 2013. Plaintiffs' deadline will be November 18, 2013 and Defendants' deadline will be December 18, 2013.

Pursuant to this Court's order of September 5, 2013, this case is not set for trial until April 2014. Granting this motion will not delay any proceedings.

The request is made for good cause, not to cause delay.

Dated: September 24, 2013.

Respectfully submitted,

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ATTORNEYS FOR PLAINTIFFS

CERTIFICATE OF SERVICE

By my signature above, I certify that a true and correct copy of the foregoing has been served on all counsel of record through the Electronic Case Files System of the Northern District of Texas.

CERTIFICATE OF CONFERENCE

By my signature above, I certify that I conferred with counsel for Defendants, and they are unopposed to this motion.